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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 GRETCHEN SALOMONSON, Individually

12 Plaintiff,

13 vs.

14 TARGET CORPORATON, a foreign
15 corporation, dba TARGET STORE 2568;
16 DOES I through X, inclusive, ROE
17 BUSINESS ENTITIES I through X,
18 inclusive,

19 Defendants.

CASE NO.: 2:21-cv-01776-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[SECOND REQUEST]

20 Plaintiff Gretchen Salomonson (“Plaintiff”) and Defendant Target Corporation (“Defendant”),
21 by and through their respective counsel of record, do hereby stipulate to extend the discovery cutoff in
22 the present case for a period of 60 days.

23 Pursuant to LR IA 6-1, the parties hereby aver that this is the second discovery extension
24 request in this matter.

25 ///

26 ///

DISCOVERY COMPLETED TO DATE

The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures, authorizations have been exchanged, medical records have been requested by Defendants, and parties are engaged in written discovery.

DISCOVERY TO BE COMPLETED AND REASONS

FOR EXTENSION OF DISCOVERY

Discovery to be completed includes:

- Depositions of fact witnesses
- Expert disclosures
- Depositions of expert witnesses
- Deposition of Defendant's Rule 30(b)(6) witnesses

Defendants have recently obtained the necessary medical documentation for experts review and requires additional time to make decisions regarding expert disclosures.

Further, due to COVID-19 related restrictions, the gathering of medical records, and conducting an examination pursuant to FRCP 35, has been delayed.

Further, due to COVID-19 related staffing, furloughs and related attrition, locating witnesses and scheduling depositions has been delayed. With the reduction in related limitations the parties are confident that a granting of the request for a 60-day extension of the remaining discovery deadlines would allow them to complete the required discovery. This request is made in good faith, not for the purpose of delay.

NEW DISCOVERY DEADLINES

Initial Expert Disclosure:

Currently: May 20, 2022
Proposed: June 20, 2022

~~**Interim Status Report:**~~

~~Currently: May 20, 2022~~
~~**Proposed: June 20, 2022**~~

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Rebuttal Expert Disclosure:

Currently: June 19, 2022

Proposed: July 19, 2022

Discovery Cutoff:

Currently: July 19, 2022

Proposed: August 19, 2022

Dispositive Motions:

Currently: August 16, 2022

Proposed: September 15, 2022

Pretrial Order:

Currently: September 13, 2022, or 30 days after resolution of dispositive motions per Local Rule 26-1(b)(5)

Proposed: October 13, 2022, or 30 days after resolution of dispositive motions per Local Rule 26-1(b)(5)

If this extension is granted, all depositions mentioned above should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 22nd day of April, 2022

DATED this 22nd day of April, 2022

/s/ John T. Keating

John T. Keating, Esq.

KEATING LAW GROUP

9130 W. Russell Road, Suite 200

Las Vegas, Nevada 89148

Attorneys for Plaintiff

Gretchen Salomonson

/s Alan W. Westbrook

Alan W. Westbrook, Esq.

PERRY & WESTBROOK

11500 S. Eastern Avenue, Ste. 140

Henderson, NV 89052

Attorneys for Defendant

Target Corporation

IT IS SO ORDERED that the parties' Joint Discovery Plan and Scheduling Order is granted in part and denied in part. The plan includes an interim status report deadline that does not exist and is therefore **DENIED**. All remaining deadlines are **GRANTED**.

DATED this 26th day of April, 2022


DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

Subject: Re: Gretchen Salomonson v. Target Corporation (Case No. 2:21-cv-01776-JCM-DJA)
From: Veronica Gonzalez <vgonzalez@perrywestbrook.com>
Date: 4/22/2022, 9:55 AM
To: "J. Keating" <jkeating@keatinglg.com>, "S. Boschee" <sboschee@keatinglg.com>
CC: Jennifer Meacham <jmeacham@perrywestbrook.com>, "Alan W. Westbrook" <awestbrook@perrywestbrook.com>

Thank you Mr. Keating. Have a wonderful day.

On 4/22/2022 9:56 AM, J. Keating wrote:

This is fine

From: Veronica Gonzalez <vgonzalez@perrywestbrook.com>
Sent: Friday, April 22, 2022 9:22 AM
To: J. Keating <jkeating@keatinglg.com>; S. Boschee <sboschee@keatinglg.com>
Cc: Jennifer Meacham <jmeacham@perrywestbrook.com>; Alan W. Westbrook <awestbrook@perrywestbrook.com>
Subject: Re: Gretchen Salomonson v. Target Corporation (Case No. 2:21-cv-01776-JCM-DJA)

Dear Mr. Keating,

Please see attached stipulation and order to extend discovery deadlines (second request). Please advise of any changes and please confirm if we have your permission to apply your electronic signature. Thank you for your kind attention.

On 4/22/2022 8:52 AM, J. Keating wrote:

yes

From: Veronica Gonzalez <vgonzalez@perrywestbrook.com>
Sent: Friday, April 22, 2022 8:37 AM
To: J. Keating <jkeating@keatinglg.com>; S. Boschee <sboschee@keatinglg.com>
Cc: Jennifer Meacham <jmeacham@perrywestbrook.com>; Alan W. Westbrook <awestbrook@perrywestbrook.com>
Subject: Re: Gretchen Salomonson v. Target Corporation (Case No. 2:21-cv-01776-JCM-DJA)

Good Morning Mr. Keating,

Hope you are having a great Friday morning. Would you be agreeable to a 30 day extension to all discovery deadline dates?

Please advise, and I will gladly email you the proposed stip to extend for your review.

Thank you for your kind attention to this matter.

On 4/21/2022 3:53 PM, Alan W. Westbrook wrote: